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September 11, 2022

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: United States v. Franzone
21 CR 446 (VSB)

Dear Judge Broderick,

On behalf of Defendant Andrew Franzone (“Franzone”), we now have additional corroboration that Mr. Franzone frequented the W Hotel.

Attached, please find proof of two payments from Mr. Franzone to El Vez FL through PayPal made in April of 2021. Also attached, please find a printout from Marriott.com, which shows that the El Vez FL is located at the W Hotel.

Thank you for your consideration.

Respectfully,

/s/ Angela D. Lipsman
Angela D. Lipsman, Esq.

cc: AUSA Kiersten Fletcher (via ECF)